

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division

AMF BOWLING CENTERS, ET AL,

Plaintiffs,

v.

THOMAS TANASE,

Defendant.

Case No: 3:23-cv-448

SECOND AFFIDAVIT OF THOMAS TANASE IN SUPPORT OF  
DEFENDANT'S OPPOSITION TO PLAINTIFFS' AMENDED MOTION  
FOR SANCTIONS.

COMES NOW DEFENDANT THOMAS TANASE, by counsel, Alan J. Cilman and I.  
Scott Pickus, and submits the following affidavit in support Defendant's opposition to  
"Plaintiffs' Amended Motion for Sanctions":

**Commonwealth of Virginia:**

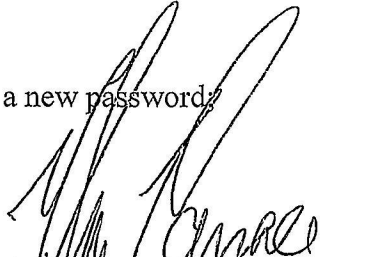
County of Hanover

I, Thomas Tanase, being duly sworn, deposes and says:

1. I am the Defendant in the Captioned case;
2. I have read the previously filed "*Defendant Thomas Tanase's Response In Opposition To Plaintiffs' Amended Motion For Sanctions*" and memorandum in support thereof;
3. I, hereby certify that the facts contained therein are true and correct to the best of my knowledge and belief.
4. I did not alter or edit the recordings between me and Brett Parker;
5. I did not hack into Tom Shannon's computer;

6. My password was changed when I was fired
7. After I was terminated, I contacted the manager of support, the assistant manager of support, and the manager of systems for Bowlero to gain access to my Bowlero issued computer;
8. They assisted me, including giving me a new password.

Furthermore, your affiant sayeth not.

  
Thomas Tanase



SUBSCRIBED and SWORN to before me this 2<sup>nd</sup> day of May 2024.

  
Notary Public

I.D. No.: 8110466

My Commission Expires: 07/31/2028

Respectfully submitted,

Thomas Tanase  
By Counsel

/s/Alan J. Cilman

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/s/I.Scott Pickus

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 2<sup>nd</sup> day of May 2024 I will electronically file the foregoing “SECOND AFFIDAVIT OF THOMAS TANASE IN SUPPORT OF DEFENDANT’S OPPOSITION TO PLAINTIFFS’ AMENDED MOTION FOR SANCTIONS” with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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